

From: petersjoan <petersjoan@bellsouth.net>
Subject: Re: Request for Meet and Confer/ Doe v. Bonnell
Date: May 20, 2025 at 7:14:11 AM PDT
To: Andrew Brettler <abrettler@berkbrettler.com>
Cc: Robert "Bob" L. Raskopf <rraskopf@bilzin.com>, "Patricia M. Patino" <ppatino@bilzin.com>, Jake Camara <jcamara@berkbrettler.com>, Joel Sichel <jsichel@berkbrettler.com>, Kai Alblinger <kalblinger@berkbrettler.com>, "Carlos A. Garcia Perez" <cgarciaperez@smgqlaw.com>, "Gustavo D. Lage" <glage@smgqlaw.com>

Here is the draft motion and draft proposed order.

On Monday, May 19, 2025, 10:04:17 PM EDT, petersjoan <petersjoan@bellsouth.net> wrote:

To be clear, I am not proposing filing a joint motion thus I do not think it necessary to provide a draft motion in order to conduct a proper meet and confer. I am merely asking if your client consents to, or does not object to, plaintiff's below described motion submitting the proposed order, and filing the proposed order under seal. Nevertheless, I will provide a confidential draft motion tomorrow morning.

On Monday, May 19, 2025, 09:26:22 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I'll discuss it with my client and get back to you. In all likelihood, it will be after your noon EDT deadline tomorrow. In the meantime, please provide me with a copy of the proposed order so we can conduct a proper meet and confer. Thanks.

Andrew B. Brettler | BERK BRETTLER LLP
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On May 19, 2025, at 6:21 PM, petersjoan <petersjoan@bellsouth.net> wrote:

I do not have a draft motion as of yet. The proposed agreed order is simply an order requiring KiwiFarms to remove specific URLs which contain a link to the Video. KiwiFarms has agreed to remove these specific URLs upon an order from the court. The proposed order will be filed under seal so that the URLs are not available to the public. My question is whether defendant consents to: 1) plaintiff asking the court to enter an order requiring KiwiFarms to remove specific URLs that link to the Video; and 2) the proposed order which simply lists the specific URLs being filed under seal.

On Monday, May 19, 2025, 07:18:26 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

I do not understand your contemplated motion. What is the "proposed agreed order" to which you refer in your email below? Please send me a copy so we can properly meet and confer. Thank you.

Andrew B. Brettler | BERK BRETTLER LLP
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On May 19, 2025, at 2:50 PM, Joan peters <petersjoan@bellsouth.net> wrote:

Andrew:

As you are aware, we served a subpoena on KiwiFarms. KiwiFarms has responded and we have received a response and partial production. We should be receiving an additional production in the next few days. KiwiFarms has restricted the production of these documents to attorney's eyes only. If you accept this restriction in writing, we will arrange for the documents to be shared with you.

I am also writing as a meet and confer on the following. KiwiFarms has consented to removing various links to the Video pursuant to a court order. We will be filing a motion requesting the court to enter the proposed agreed order. Do you have any objection to the same? Please advise by noon EST tomorrow.

thanks,
Joan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Miami Division

JANE DOE,

Case No: 1:25-cv-20757-JB/Torres

Plaintiff,

vs.

STEVEN K. BONNELL II,

Defendant.

**PLAINTIFF JANE DOE'S MOTION FOR ENTRY OF AGREED ORDER
TO COMPEL LOLCOW LLC TO REMOVE VIDEOS**

TO THE HONORABLE COURT:

COMES NOW Plaintiff Jane Doe, by and through undersigned counsel, and respectfully states and alleges as follows:

1. Plaintiff has been engaged in on-going efforts to have the Video¹ removed from the multiple different platforms on which it was published, including the Kiwi Farms platform. Kiwi Farms is managed and operated by Lolcow LLC. The Video was originally published on Kiwi Farms on November 29, 2024. (*See* ECF 1). On February 20, 2025, two days after the Complaint in this action was filed, the custodian of records of Kiwi Farms removed the original post of the Video, and replaced it with the following message:

In light of a lawsuit filed against Destiny for allegedly unlawful dissemination of private images, the Kiwi Farms has made private the videos which may be in contention. No party to this lawsuit has formally raised issue with, or threatened us because of, these particular videos, and we would generally not allow any person to obfuscate content on this website.

¹ The Video is that certain video depicting Plaintiff that was non-consensually shared by Defendant Bonnell, and as further defined in the Complaint. ECF 1.

This decision is done out of an abundance of caution for the potential victims.

We are attempting to balance two points: (1) the inherent public interest in one of the most prolific, well-known liberal political pundits in the whole of the United States, and (2) the privacy and safety of those featured in this content.

Putting the videos behind a registration barrier, in our opinion, will practice harm reduction by limiting the spread of this content to users already on the Kiwi Farms who are participating in the discussion.

We are sorry for those who have been negatively impacted by what appears to be a reckless disregard for the privacy and mental wellbeing of innocent people by a person with an inordinate amount of influence and wealth.

Anyone attempting to assert that the Kiwi Farms is the problem, and not the individuals who caused this breach of trust, is perhaps hoping to divert attention and culpability for actions which they are solely responsible for.

Kind regards,
Joshua Moon
Custodian of Records

See <https://kiwifarms.st/threads/steven-bonnell-ii-destiny-destiny-gg.29205/page-981>.

2. Although the original post which included the link to the Video was removed by Kiwi Farms, the Video resurfaced in multiple other posts on Kiwi Farms. Plaintiff had a subpoena served on Lolcow LLC on May 10, 2025. The subpoena requested the production of certain documents, and also the removal of the links to the Video depicting Plaintiff.

3. Lolcow LLC/Kiwi Farms has cooperated with Plaintiff's requests to produce documents, and has expressed its willingness to remove all specified URLs which link to the Video upon receipt of an order from this Court. Lolcow LLC has reviewed the proposed order, attached hereto in redacted form as **Exhibit A**, and has stated that it will not object and will comply once the order is entered by the Court. Plaintiff is simultaneously filing a Motion for Leave to File Under

Seal the unredacted proposed order. The unredacted proposed order contains the specific URLs which link to the Video.

4. Defendant does not object to the entry of the proposed order.

WHEREFORE, Plaintiff respectfully requests that this Court order Lolcow LLC to remove the specific URLs which link to the Video on Kiwi Farms, as set forth in the proposed order, and order any other relief it deems just and proper.

Dated: May 29, 2025.

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Counsels for Plaintiff

/s/ Carlos A. Garcia Perez

By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed on May 6, 2025, to the below counsel of record.

/s/ Carlos A. Garcia Perez
By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

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Counsel for Defendant STEVEN K. BONNELL II

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO: 1:25-cv-20757-JB**

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

_____ /

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL LOLCOW,
LLC TO REMOVE VIDEOS OF JANE DOE**

THIS CAUSE came before the Court on Plaintiff Jane Doe's Motion to Compel Lolcow, LLC to Remove Videos of Jane Doe on the Kiwi Farms platform [Dkt. No. ____] (the "Motion"). Upon due consideration of the Motion, the relevant portions of the record, and for good cause shown, it is hereby ORDERED AND ADJUDGED that the Motion is GRANTED.

LOLCOW, LLC is hereby ordered to permanently remove from its website Kiwi Farms the following URLs which contain or link to a non-consensual intimate image/video of Plaintiff, specifically:

DONE AND ORDERED in Miami, Florida, on this _____ day of May, 2025.

**HONORABLE JACQUELINE BECERRA
U.S. DISTRICT COURT JUDGE**